

HINSHAW

& C U L B E R T S O N L L P

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November 17, 2014

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**RE: John J. O'Neill v. LVNV Funding, LLC et al.
1:14-cv-07636-ER**

Dear Judge Ramos:

We represent defendants LVNV Funding, LLC, Resurgent Capital Services, LP and Aegis Group, LLC (collectively the “LVNV Defendants”) in the above referenced matter. We respectfully request that the Court extend the LVNV Defendants’ time to answer, move or otherwise respond to plaintiff’s complaint, from November 18, 2014 to December 16, 2014.

We require this extension as we were just today retained to represent the LVNV Defendants in this matter. As such, we need some time investigate the relevant facts and to prepare a response. Plaintiff has consented to this extension and no prior request for an extension has been requested. Furthermore, this extension will not affect any other scheduled dates.

Respectfully submitted,

HINSHAW & CULBERTSON, LLP
*Attorneys for defendants LVNV Funding,
LLC, Resurgent Capital Services, LP and
Aegis Group, LLC*

/s Han Sheng Beh
Han Sheng Beh

Cc: Ahmad Keshavarz
attorney for plaintiff (via ECF)

Steven Cohen
attorney for Cohen & Krassner (via ECF)

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